

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

FREE SPEECH SYSTEMS, LLC,

Plaintiff,

v.

STEVE DICKSON, in his personal capacity
and as administrator of the Federal Aviation
Administration; and the FEDERAL
AVIATION ADMINISTRATION,

Defendants.

Case No. 1:21-cv-00826

**DECLARATION OF
ALEX JONES**

I, ALEX JONES, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
2. I am the managing member of Free Speech Systems, LLC.
3. Free Speech Systems, LLC is a media organization which publishes news, commentary, punditry and entertainment online and through streamed news broadcasts to viewers across the globe.
4. Infowars uses unmanned aerial systems ("UAS") to take photographs and videos as an integral part of its newsgathering activities.
5. The use of UAS in newsgathering is important because it allows Infowars to photograph breaking news events from a unique perspective, which can show the scale and mass of an event involving a large number of people in a way that traditional photography cannot.
6. Infowars deployed journalists on the ground to monitor and report on the humanitarian crisis occurring at the Del Rio International Bridge.

7. Because of the location of the migrant mass, it is difficult, if not impossible, for the press on the ground to access where the migrants are located.

8. Because of the significant number and the remote location of the migrants, it is difficult for the press to photograph the mass of migrants with traditional means, which renders the press unable to fully express the scope of the crisis in visual format, which is a critical component of the news stories that are being covered on the ground.

9. Infowars and many other news organizations have been present on the ground in Del Rio will the migrant crisis has been unfolding.

10. Infowars and other news organizations have been using UAS photography as a newsgathering tool to capture images and videos of the mass of migrants and to measure, estimate, and document facts such as crowd size and movements across the border during this breaking news event.

11. The use of UAS is a critical means for Infowars to produce breaking news relating to the Del Rio migrant crisis.

12. Infowars has been harmed, and will continue to be harmed, by the FAA's imposition of the TFR.

13. Infowars has expended a significant sum of money and effort to send its journalists to the Del Rio migrant crisis to produce news.

14. Even if other Press outlets did not send their own drone and journalists to the area, there are freelance drone pilots that could be hired, and Infowars would be willing to enter into agreements to share its footage with other Press outlets.

15. The effect of the TFR is that Infowars and other members of the press are unable to operate UAS in the vicinity of the Del Rio migrant crisis for newsgathering activities.

16. With the TFR in place, Infowars is prevented from being able to effectively cover the growing crisis.

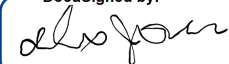
17. Without injunctive relief, Infowars will not be able to effectively document and observe the crisis as it unfolds over the coming days.

18. Temporary relief is necessary because the Del Rio migrant crisis is a hot news event, and the crisis will likely dissipate before the TFR instituted by the FAA expires.

19. Without immediate injunctive relief, Infowars and other members of the press will not be able to document and report on the Del Rio migrant crisis, which is of significant public interest.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/17/2021.

DocuSigned by:

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Alex E. Jones